

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

ROBERT DE VITO, individually and on  
behalf of all others similarly situated,

Plaintiff,

v.

LIQUID HOLDINGS GROUP, INC.,  
BRIAN M. STORMS, KENNETH D.  
SHIFRIN, PETER R. KENT, RICHARD  
SCHAEFFER, BRIAN FERDINAND,  
JAY BERNSTEIN, DARREN DAVY,  
DAVID FRANCESCANI, WALTER  
RAQUET, THOMAS ROSS, VICTOR  
SIMONE, JR., DENNIS SUSKIND,  
ALLAN ZAVARRO, and SANDLER,  
O'NEILL & PARTNERS, LP.,

Defendants.

Civil Action No. 2:15-cv-06969-KM-JBC

[PROPOSED] ORDER GRANTING  
ADMISSION PRO HAC VICE

**THIS MATTER** having been brought before the Court on the application of Michael D. Hynes, attorney of record in this action for defendant Robert D. Keller, for an Order allowing John J. Clarke, Jr. to appear and participate *pro hac vice*; and the Court having considered the moving papers; and this matter being considered on the papers pursuant to Rule 78(b) of the Federal Rules of Civil Procedure, and for good cause shown;

**IT IS** on this \_\_\_\_ day of \_\_\_\_\_, 2016,

**ORDERED** that John J. Clarke, Jr., a member of the Bar of the State of New York, be permitted to appear *pro hac vice* in the above-captioned matter pursuant to Local Civil Rule 101.1(c); and it is further

**ORDERED** that all pleadings, briefs, and other papers filed with the Court shall be signed by a member or associate of the law firm of DLA Piper LLP (US), attorneys of record for

Mr. Keller, who is admitted to the Bar of this Court, who shall be held responsible for said papers and for the conduct of the case, and who will be held responsible for the conduct of the attorney admitted hereby; and it is further

**ORDERED** that Mr. Clarke shall pay the annual fee to the New Jersey Lawyers' Fund for Client Protection in accordance with New Jersey Court Rule 1:28-2 within twenty (20) days from the date of the entry of this Order; and it is further

**ORDERED** that Mr. Clarke shall make payment of \$150.00 to the Clerk of the United States District Court in accordance with Local Civil Rule 101.1(c)(3), as amended, within twenty (20) days from the date of the entry of this Order; and it is further

**ORDERED** that Mr. Clarke shall be bound by the Rules of the United States District Court for the District of New Jersey, including, but not limited to, the provisions of Local Civil Rule 103.1, Judicial Ethics and Professional Responsibility, and Local Civil Rule 104.1, Discipline of Attorneys

**ORDERED** that Mr. Clarke shall be deemed to have agreed to take no fee in any tort case in excess of the New Jersey State Court Contingency fee Rule, Rule 1:21-7, as amended; and it is further

**ORDERED** that Mr. Clarke may file a request, the form of which is available at the Court's website, with the Clerk of the Court for *pro hac vice* counsel to receive electronic notifications in this matter

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Honorable James B. Clark, III  
United States Magistrate Judge